

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION INJURY
LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

**This Documents Relates To:
All Cases**

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

**PLAINTIFF AND PUTATIVE CLASS REPRESENTATIVE ADRIAN ARRINGTON'S
OBJECTION TO THE PRESENTLY PROPOSED SETTLEMENT**

Plaintiff and putative class representative, ADRIAN ARRINGTON, through his attorneys, CLIFFORD LAW OFFICES. P.C., having been given leave of Court as set forth in the Court's Order [Doc. #208], in opposition to the presently proposed settlement, states as follows:

1. Before the Court is a proposed settlement of this litigation, a case initially filed by Adrian Arrington for which he sought relief for injuries suffered as an NCAA athlete. [Doc. #1].

2. As set forth more fully in the declaration of Adrian Arrington [Exhibit A], Mr. Arrington opposes the currently proposed settlement as the settlement does not provide any meaningful relief to him, or players like him, who suffered injuries for which they have been diagnosed and now pay for necessary medical treatment.

3. As set forth more fully in the declaration [Exhibit A], Adrian Arrington consented to a settlement model that allowed for players to pursue their claims for relief in the form of compensatory damages. His intention was to provide injured players an opportunity to receive

compensation for the injuries suffered, and medical treatment received, as a result of certain acts or omissions by the NCAA. His understanding was that a settlement of this case would allow all players to pursue such relief. He neither contemplated, nor approved, a settlement that did not provide for him, or players like him, relief for the life-changing injuries suffered by players.

4. Because the settlement does not provide for the relief sought by Adrian Arrington, on behalf of himself and others, and because Mr. Arrington understands that he, and players like him, will not effectively receive from this settlement any relief, as set forth more fully in his declaration [Exhibit A], Mr. Arrington objects to and opposes the proposed settlement.

WHEREFORE, Plaintiff, and putative class representative, ADRIAN ARRINGTON, through his attorneys, CLIFFORD LAW OFFICES, P.C., seeks entry of an Order by this Honorable Court granting setting aside the presently proposed settlement, and for any other relief this Court deems just.

Respectfully submitted,

/s/ Shannon McNulty
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CERTIFICATE OF SERVICE

I, Shannon M. McNulty, an attorney, hereby certify that on November 5, 2015, I served the above and foregoing **PLAINTIFF AND PUTATIVE CLASS REPRESENTATIVE ADRIAN ARRINGTON'S OBJECTION TO THE PRESENTLY PROPOSED SETTLEMENT**, by causing a true and accurate copy of such papers to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Shannon M. McNulty

Shannon M. McNulty

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